

June 13, 2014

Mr. Charles David Abshire (6SF-AP)  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2773

RE: May 2014 Monthly Report  
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210  
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

The Malone Cooperating Parties (MCP) submit the Monthly Report for May 2014 in compliance with the Consent Decree and Statement of Work for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX.

Should you have any questions, please contact me at 919-539-1928 or [bobp@projectnavigator.com](mailto:bobp@projectnavigator.com).

Sincerely,

*R Piniewski*

Robert Piniewski  
Project Coordinator

cc: Marilyn Long - TCEQ  
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE  
MONTHLY PROGRESS REPORT FOR MAY 2014  
SUBMITTED JUNE 13, 2014**

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**1) SUMMARY OF WORK PERFORMED IN MAY 2014**

- a) PNL, ENTACT and MCP mobilized on April 7, 2014 to begin Phase One RA work. Work conducted during May included:
  - (1) Tank cleaning and demolition
  - (2) Asbestos Abatement, Waste removal and lab pack
  - (3) Solidification Pilot Study
  - (4) Building and concrete demolition
  - (5) Preparation for the slurry wall installation
- b) EnSafe, the MCP Independent Quality Assurance Team (IQAT) contractor observed Phase One RA work.
- c) MCP representatives mobilized on April 7, 2014 to begin cemetery relocation work. On-site cemetery relocation work was completed on May 8, 2014.
- d) MCP representatives submitted injection well rehabilitation procedures to EPA and continued work on reissuance of the No Migration Exemption.
- e) MCP representatives continued stormwater management activities at the Site.

**2) SUMMARY OF SAMPLING/TESTING RESULTS**

- a) Sampling was performed on multiple tasks as defined in the Phase One RA Work Plan and results will be provided in future reports or plans as required by the SOW.

**3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS**

- a) A summary of the most recent Agency Communication is shown in Table 1.

**4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN**

- a) None.

**5) COMMUNITY RELATIONS ACTIVITIES**

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

**6) CHANGE IN PERSONNEL OR OPERATIONS**

- a) None.

**7) SCHEDULE**

- a) The Phase One RA Work Plan contains the project schedule.

**8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS (JUNE and JULY 2014)**

- a) Continue Phase One RA work.
- b) Continue Cemetery Relocation efforts for reinterment.
- c) Continue stormwater management activities at the Site.
- d) Schedule Basis of Design Meeting for Phase Two RD/RA Work Plans
- e) Complete WDW-138 and WDW-73 Rehabilitation Work Over Procedures.
- f) Prepare the petition for renewal of the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells.
- g) Conduct Mechanical Integrity Test and Temperature Log for WDW-138 and WDW-73 once rehab activities are complete

**Table 1**  
**Recent Agency Communication Summary**  
**Malone Service Company Superfund Site – Texas City, TX**

<b>Date</b>	<b>MCP Communication Summary</b>	<b>Response From EPA Date</b>	<b>EPA Communication Summary</b>	<b>Notes</b>
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One Remedial Action Work Plan.	pending		
12/20/13	Submitted draft Phase One Remedial Action Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	EPA comments received on 1/31/14.	
1/31/14	MCP received EPA and TCEQ comments on Phase One Remedial Action Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	
2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	

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2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		
3/3/14	The MCP submitted its responses to Agency comments on the draft Phase One Remedial Action (RA) Work Plan.	3/4/14	EPA approved the response to comments via email.	
3/4/14	The MCP received information from EPA to facilitate the approval/reissuance of the No Migration Exemption for the injection well.	n.a.		
3/6/14	The MCP submitted a copy of the order of the Galveston County District Court granting our motion for summary judgment on the petition for removal of remains and removal of the cemetery dedication regarding the cemetery area at the Malone Site.	n.a.		
3/10/14	The MCP submitted the Final Phase One RA Work Plan and Storm Water Management Plan V1.	3/25/14	EPA approved the Phase One RA Work Plan.	
3/25/14	The MCP notified EPA and TCEQ that ENTACT will mobilize to the Site on April 7, 2014 to begin Phase One RA work and that MCP representatives will also be mobilizing on April 7, 2014 to begin cemetery relocation work.	n.a.		
4/7/14	The MCP submitted a request to shift the installation of the dewatering system and slurry wall from Phase Two to Phase One RA work. The early install of these remedy elements will allow the MCP to begin dewatering sooner and improve solidification efforts.	4/10/14	EPA approved the request.	
5/9/14	The MCP submitted the injection well rehabilitation procedures for the injection wells at the Site.	5/29/14	EPA approved the procedures.	